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Counsel for Defendant  
 Melanie Wrate

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 EUREKA DIVISION

UNITED STATES OF AMERICA,	)	CR 15-0528-VC (NJV)
	)	
Plaintiff,	)	<b>STIPULATION AND PROPOSED</b>
vs.	)	<b>ORDER TO AMEND CONDITIONS OF</b>
	)	<b>PRE-TRIAL RELEASE TO ALLOW</b>
MELANIE WRATE,	)	<b>DEFENDANT TO TRAVEL TO</b>
	)	<b>EASTERN DISTRICT OF CALIFORNIA</b>
Defendant.	)	Hon. NANDOR J. VADAS
	)	United States Magistrate Judge

The defendant Melanie Wrate, through her attorney John J. Jordan, hereby moves for an order amending the conditions of her pre-trial release, to allow the defendant to travel to the Eastern District of California, for the time period of June 29, 2016, through July 13, 2016, for a family vacation.

1. On July 14, 2014, this Court arraigned the defendant on the pending complaint, and continued the pre-trial release of the defendant on a \$50,000.00 unsecured bond, with travel restricted to the Northern District of California.

2. On December 15, 2015, the defendant pled guilty to one count of Possession with Intent to Distribute LSD, in violation of 21 U.S.C. § 841(a)(1). The district court accepted the defendant's diversion agreement, continued the defendant on bail, and set sentencing for December 13, 2016.

3. The defendant has now requested counsel seek a travel order, authorizing travel for a

1 family vacation to the Eastern District of California, for the time period of June 29, 2016,  
2 through July 13, 2016, for a family vacation. Ms. Wrate would travel by car with her boyfriend  
3 and children to Sacramento, then to South Lake Tahoe and Chico, to vacation and visit family  
4 members, if the Court authorized her travel request. Ms. Wrate had earlier spoken to her pre-trial  
5 services officer, Kenneth Gibson, of this proposed trip. Officer Gibson is monitoring the  
6 defendant on the diversion program.

7 4. On June 20, 2016, P.O. Gibson informed counsel that he has no objection to this  
8 travel, but that a travel order would be needed.

9 5. On June 22, 2016, Matthew McCarthy, the Assistant U.S. Attorney assigned to this  
10 case, informed counsel that he had no objection to this request.

11 6. The defendant would provide a travel itinerary to U.S. Pretrial in advance of  
12 defendant's travel and call her pre-trial officer upon her return.

13 7. A proposed order is being submitted with this stipulation.

14 WHEREFORE, the defendant respectfully requests that this Court issue an order  
15 amending the standard conditions of pre-trial release, to allowing the defendant to travel to the  
16 Eastern District of California, for the time period of June 29, 2016, through July 13, 2016, all  
17 other conditions of pre-trial release to remain unchanged.

18 Dated: June 23, 2016.

Respectfully submitted,

19  
20 /s/ John J. Jordan  
21 JOHN J. JORDAN  
22 Counsel for Melanie Wrate  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
EUREKA DIVISION

UNITED STATES OF AMERICA,	)	CR-15-0528-VC (NJV)
	)	
Plaintiff,	)	<del>(Proposed)</del> <b>ORDER</b>
vs.	)	
	)	
MELANIE WRATE,	)	
	)	Hon. NANDOR J. VADAS
Defendant.	)	United States Magistrate Judge
_____		

FOR GOOD CAUSE SHOWN, it hereby ORDERED that the conditions of pre-trial release for the defendant MELANIE WRATE are hereby amended to allow the defendant to travel to Eastern District of California, for the time period of June 29, 2016, through July 13, 2016, all other release conditions to remain unchanged.

Prior to any such travel, the defendant is to provide a travel itinerary to United States Pretrial Services and inform Pretrial Services upon her return.

Dated: June 24, 2016.

Respectfully submitted,

  
HON. NANDOR J. VADAS  
United States Magistrate Judge